

# EXHIBIT 3

## COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG  
LONDON LOS ANGELES NEW YORK PALO ALTO  
SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

**Gary M. Rubman**

Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 5465  
grubman@cov.com

**Via Email**

November 28, 2018

Jonathan Jacobs  
Zobrist Law Group, PLLC  
1900 Arlington Boulevard, Ste B  
Charlottesville, VA 22903  
jjacobs@zoblaw.com

**Re: *Video Gaming Technologies, Inc. v. Castle Hill Studios, et al.*, Case No. 4:17-cv-00454-GKF-JFJ**

Dear Jonny:

I write regarding the designations for the depositions of Richard Williamson, both in his individual capacity and as a corporate designee.

### **I. June 14 Deposition**

VGT hereby designates the June 14, 2018 transcript as follows:

4:13-16	Highly Confidential
5:5-6	Highly Confidential
20:12-19	Confidential
28:8-10, 20-25	Highly Confidential
29:1-5	Highly Confidential
45:11-25	Highly Confidential
46:1 - 47:16	Highly Confidential
48:10 - 49:7	Highly Confidential
63:4 - 65:16	Highly Confidential
73:2 - 74:2	Highly Confidential
75:12-25	Confidential
76:1-10	Confidential
76:24 - 77:16	Highly Confidential
81:1-25	Highly Confidential
82:1-17, 20-23	Highly Confidential
84:15 - 87:13	Highly Confidential
88:20 - 91:4	Highly Confidential

**COVINGTON**

Jonathan Jacobs  
November 28, 2018  
Page 2

92:21-25	Confidential
93:1-25	Confidential
94:1-3	Confidential
94:11-25	Highly Confidential
98:19-24	Highly Confidential
99:4-24	Highly Confidential
102:2-25	Highly Confidential
103: 1-25	Highly Confidential
104:1-6	Highly Confidential
105:2-12	Confidential
105:13 - 110:4	Highly Confidential
111:15 - 115:25	Highly Confidential
116:20-25	Highly Confidential
117:1-19	Confidential
118:3-20	Highly Confidential
119:13-20	Highly Confidential
120:6-9, 19-25	Highly Confidential
121:6-25	Highly Confidential
122:24 - 124:23	Highly Confidential
125:25 - 126:10	Highly Confidential
126:22-25	Highly Confidential

VGT also designates all deposition exhibits to the June 14 deposition as Highly Confidential:

Exhibit No. 10	Highly Confidential
Exhibit No. 101	Highly Confidential
Exhibit No. 102	Highly Confidential
Exhibit No. 103	Highly Confidential
Exhibit No. 104	Highly Confidential
Exhibit No. 105	Highly Confidential
Exhibit No. 106	Highly Confidential
Exhibit No. 107	Highly Confidential
Exhibit No. 108	Highly Confidential
Exhibit No. 109	Highly Confidential

VGT de-designates the remainder of this deposition transcript.

**COVINGTON**

Jonathan Jacobs  
November 28, 2018  
Page 3

**II. October 2 Deposition**

VGT hereby designates the October 2, 2018 transcript as follows:

12:3-8	Highly Confidential
13:24 - 14:12	Highly Confidential
23:13 - 24:16	Highly Confidential
25:3-11	Highly Confidential
25:16 - 27:19	Highly Confidential
28:16-22	Highly Confidential
31:5 - 33:15	Highly Confidential
36:10-16	Highly Confidential
37:25 - 38:13	Highly Confidential
40:3-13	Highly Confidential
41:13 - 42:25	Highly Confidential
43:14 - 45:3	Highly Confidential
45:10 - 48:5	Highly Confidential
48:14-25	Highly Confidential
51:19 - 54:5	Highly Confidential
55:6-13	Highly Confidential
56:9 - 61:19	Highly Confidential
62:20 - 64:9	Highly Confidential
69:25 - 73:16	Highly Confidential
75:8 - 77:2	Highly Confidential
78:3 - 82:24	Highly Confidential
84:8 - 85:19	Highly Confidential

VGT also designates the following deposition exhibits to the October 2 deposition as Highly Confidential:

Exhibit No. 105	Highly Confidential
Exhibit No. 4	Highly Confidential
Exhibit No. 5	Highly Confidential
Exhibit No. 6	Highly Confidential
Exhibit No. 7	Highly Confidential
Exhibit No. 9	Highly Confidential

Henry Platt represented that Exhibit No. 8 to the October 2 deposition was downloaded from a website. If CHG can provide the URL of that website, VGT is prepared to review Mr. Platt's

**COVINGTON**

Jonathan Jacobs  
November 28, 2018  
Page 4

claim and, if appropriate, de-designate Exhibit No. 8. Subject to that caveat, VGT de-designates the remainder of the October 2 transcript.

Sincerely,



Gary M. Rubman